

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

In Re:

**ANTONIO DE LA VEGA MAURI  
ROSELIA ROMAN VELAZQUEZ**

Debtors

Case No. 11-00239 (SEK)

Chapter 13

**MOTION REQUESTING EXTENSION OF TIME TO ANSWER  
OBJECTION TO CLAIMS NUMBER 3 AND 4 (DOCKET 35)**

TO THE HONORABLE UNITED STATES  
BANKRUPTCY COURT

BY COUNSEL, now comes secured creditor RNPM, LLC, by and through Operating Partners Co. Inc., and respectfully REQUESTS and PRAYS as follows:

1. On March 2, 2011, Operating Partners Co. Inc. filed its secured claim number 3 and 4 in the amounts of \$258,648.89 and \$24,500.00.
2. On July 11, 2011, the debtor filed Objection to Claims 3 and 4. Docket No. 35.
3. In order to analyze and diligently respond to the debtor's objection to claim and contentions contained therein, Operating Partners Co. Inc. respectfully prays this Honorable Court to grant it an extension of time of thirty (30) days to respond to debtor's objection, that is, until September 8, 2011.

WHEREFORE, Operating Partners Co. Inc., respectfully requests this Honorable Court to take notice of the foregoing and, as a result, to grant it an extension of time of thirty (30) days to respond to debtor's objection at Docket No. 35 until September 8, 2011.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on August 8, 2011.

CERTIFICATE OF SERVICE: I hereby certify that on this same date I have filed a true and exact copy of the foregoing with the Clerk of the Court using the CM/ECF System, which will send notification to the CM/ECF participants.

**O'NEILL & GILMORE**

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By: s/Charles P.

Gilmore  
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